

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

J.T. INDIVIDUALLY AND ON BEHALF
OF D.T.; K.M., INDIVIDUALLY AND
ON BEHALF OF M.M. AND S.M.;
J.J., INDIVIDUALLY AND ON
BEHALF OF Z.J.; C.N.,
INDIVIDUALLY AND ON BEHALF OF
V.N.; AND, ALL OTHERS SIMILARLY
SITUATED

Plaintiffs,

-AGAINST-

BILL DE BLASIO, IN HIS OFFICIAL
CAPACITY AS THE MAYOR OF NEW
YORK CITY; RICHARD CARRANZA, IN
HIS OFFICIAL CAPACITY AS THE
CHANCELLOR OF NEW YORK CITY
DEPARTMENT OF EDUCATION; THE
NEW YORK CITY DEPARTMENT OF
EDUCATION; THE SCHOOL DISTRICTS
IN THE UNITED STATES; AND STATE
DEPARTMENTS OF EDUCATION IN THE
UNITED STATES

Defendants.

20-CV-5878 (CM)

**DECLARATION OF ERIC L.
HARRISON, ESQ.**

I, Eric L. Harrison, Esq., being duly sworn, depose
and say:

1. I am an attorney at law duly admitted in the
State of New York, and a partner with the law firm of
Methfessel & Werbel, attorneys for the defendants,
Middletown Board of Education, West Orange Board of
Education and Cherry Hill Board of Education, and in such

capacity I am fully familiar with the facts of the within matter.

2. I am a member in good standing of the New Jersey Bar, ID 033381993.

3. I am a member in good standing of the New York Bar, ID 2594620.

4. I have been admitted to practice before the U.S. District Court, District of New Jersey, the Third Circuit Court of Appeals and the United States Supreme Court.

5. I am a member of the firm of Methfessel & Werbel, PC and have been practicing in the State of New Jersey for 25 years.

6. I have never been disciplined or suspended from the practice of law.

7. The Middletown Board of Education, the West Orange Board of Education and the Cherry Hill Board of Education are clients of our firm and have requested that we represent their interests in this litigation. Additionally, over the next two weeks I expect that our firm will be retained by one or more joint insurance funds to represent the interests of several other school districts in this matter.

8. My firm and I have represented Defendants Middletown Board of Education, West Orange Board of

Education, Cherry Hill Board of Education and many other school districts in other disputes of this nature and I am knowledgeable of the facts and issues involved in this type of litigation.

9. I agree to abide by all Rules governing the U.S. District Court for the Southern District of New York, including all disciplinary rules.

10. Shortly after Plaintiff's counsel emailed to me the Complaint on August 12th, I obtained an application for formal admission to the Southern District of New York. I am currently awaiting receipt of paper certifications of good standing from both state bars.

11. My office is in the process of preparing a motion to dismiss the Complaint against many public school districts named as parties defendant. On Saturday, August 22, 2020, Judge Woods entered an Order setting a deadline of September 4, 2020 for the filing of such motions.

12. The Clerk of the Southern District of New York recently rejected my firm's first motion to have me admitted *pro hac vice* because we did not attach a Certificate of Good Standing from the New Jersey Bar. I have since been advised that because of limited office hours and associated administrative delays due to COVID,

the New Jersey Bar will not be providing me with a Certificate of Good Standing for 2-3 weeks.

13. Because I have presented a Certificate of Good Standing from the New York Bar and I have certified to the absence of any disciplinary action taken against me in my 26 years as a licensed attorney, I hereby request that the Court admit me pro hac vice for the purpose of appearing, participating and representing any Defendant School Districts who may retain my firm to provide representation in this lawsuit.

14. I swear under penalty of perjury that the foregoing statements made by me are true.

DATED: Edison, New Jersey
September 1, 2020

By: 

Eric L. Harrison, Esq.

Sworn to and subscribed
before me this 1st day of
September 2020



Lori Ann Smith
Notary Public

LORI ANN SMITH
Notary Public, State of New York
No. 01877623
Qualified in New York County
Commission Expires July 16, 2022



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DATED: Edison, New Jersey
September 1, 2020

By: _____
Eric L. Harrison, Esq.

Sworn to and subscribed
before me this 1st day of
September 2020

Lori Ann Smith
Notary Public